



Oregon

John A. Kitzhaber, MD, Governor

Department of Environmental Quality

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March 18, 2013

Mr. Brian Thorne
Project Manager
Lockheed Martin Corporation
2950 N. Hollywood Way Suite 125
Burbank, CA 91505-1072

Re: The Need for Permit Modifications for Future RCRA
and CERCLA Work at the Lockheed Martin
The Dalles Facility • ORD 052 221 025

Dear Mr. Thorne:

On March 6, 2013, Lockheed Martin sent DEQ an email that contained an outline for further air sampling at the RCRA and CERCLA landfills. Because the hazardous waste post-closure permit has authority at both the RCRA landfill and CERCLA solid waste management units, changes in operation, maintenance and sampling activities require DEQ permit modification approval before such activities can begin.

The proposed air monitoring at both the RCRA and CERCLA landfills fit the requirement for a permit modification at 40 CFR 270.42 Appendix I at A.4. where:

Changes in the frequency of or procedures for monitoring, reporting, sampling, or maintenance activities by the permittee:

- a. To provide for more frequent monitoring, reporting, sampling, or maintenance ... 1
- b. Other changes 2

Without knowing the full scope of the monitoring activities DEQ leaves open the question if these activities will be a Class 1 or Class 2 modification. Regardless, if such activities are to be a one-time activity, or to implement such activities in a timely manner, the permittees can consider a temporary authorization request in accordance with 40 CFR 270.42(e).

If you have any questions or comments please contact me at either moore.fredrick@deq.state.or.us or at 541-633-2011.

Sincerely,

Fredrick Moore
Permit Writer
Eastern Region Hazardous Waste Program

Copies to: Connie Cole, ARCADIS [Helena]
Carla Fisher, EPA Region 10 [Seattle]
Dennis Faulk, EPA Region 10 [Richland]